

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-40190-FDS

2005 MAR 15 A 11:49

COLLEEN O'DONNELL,)
Plaintiff)
v.)
JOHN ASHCROFT IN HIS OFFICAL)
CAPACITY AS ATTORNEY GENERAL)
of the UNITED STATES AND HEAD OF)
DEPARTMENT OF JUSTICE AND)
FEDERAL BUREAU OF PRISONS,)
Defendant)

U.S. DISTRICT COURT
CENTRAL DISTRICT OF MASSACHUSETTS

PLAINTIFF'S PROPOSED SCHEDULING ORDER

1. All Automatic Disclosures to be due by April 8, 2005
2. All Amendments to Pleadings by April 22, 2005.
3. All Non-Expert, Written Discovery to be completed by April 29, 2005.
4. All Non-Expert Depositions to be completed by August 1, 2005.
5. Plaintiff's Expert Disclosures to be completed by August 1, 2005.
6. Plaintiff's Trial Experts deposed by September 1, 2005.
7. Defendants' Expert Disclosures by September 1, 2005.
8. Defendants' Trial Experts deposed by October 1, 2005.
9. All Rule 56 Motions For Summary Judgment due November 1, 2005.
10. All Oppositions to Motions For Summary Judgment due December 2, 2005.
11. Pre-trial Conference will be held on January 5, 2006.

RULE 16.1 CERTIFICATION


The undersigned hereby certify that they have conferred regarding a) establishing a budget for the costs of conducting litigation at all phases; and b) to consider resolution of this litigation through the use of alternative dispute resolution programs.

THE PLAINTIFF


Colleen O'Donnell

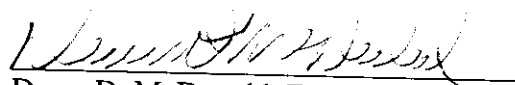
BY HER ATTORNEY

Dated: March 14, 2005
75623


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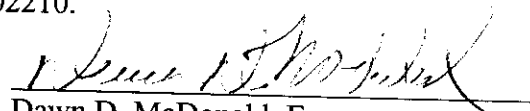
ATTORNEY'S CERTIFICATION

I, Dawn D. McDonald, Esq. hereby certify that I attempted to contact Attorney Wilmont with regard to the drafting of a joint statement and he was unavailable. I was unable to obtain a signature from another U.S. Attorney and thus have filed Plaintiff's Proposed Scheduling Order on this date.


Dawn D. McDonald, Esq.

CERTIFICATE OF SERVICE

I, Dawn D. McDonald, Esq., certify that on this 14th day of March, 2005, I caused a copy of the foregoing document to be served by facsimile upon the Defendants' attorney, Damian Wilmot, Esq., Assistant U.S. Attorney, John Joseph Moakley Federal Courthouse, One Courthouse Way, Suite 9200, Boston, MA 02210.


Dawn D. McDonald, Esq.